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 **BELLSOUTH**

OFFICE OF THE  
EXECUTIVE SECRETARY

**BellSouth Telecommunications, Inc.**  
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**Guy M. Hicks**  
General Counsel

February 6, 2001

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VIA HAND DELIVERY

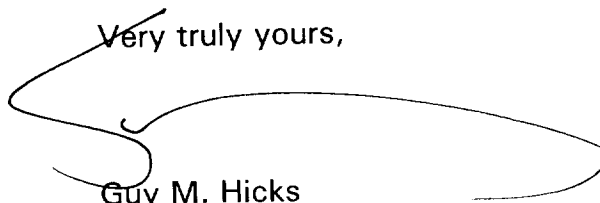
David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Complaint of AVR of Tennessee, L.P., d/b/a Hyperion of Tennessee,  
L.P. Against BellSouth Telecommunications, Inc. to Enforce Reciprocal  
Compensation and "Most Favored Nation" Provision of the Parties'  
Interconnection Agreement*  
Docket No. 98-00530

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's responses to the Staff's Data Request of January 30, 2001. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch  
Enclosure

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 98-00530  
Staff's 2<sup>nd</sup> Data Requests  
January 30, 2001  
Item No. 1  
Page 1 of 1

REQUEST: When did the parties begin negotiations of the regional settlement,  
referred to in your letter of January 24, 2001.

RESPONSE: March of 2000.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 98-00530  
Staff's 2<sup>nd</sup> Data Requests  
January 30, 2001  
Item No. 2  
Page 1 of 1

REQUEST: When did those negotiations conclude?

RESPONSE: December 22, 2000.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 98-00530  
Staff's 2<sup>nd</sup> Data Requests  
January 30, 2001  
Item No. 3  
Page 1 of 1

REQUEST: When did the regional settlement become effective?

RESPONSE: December 22, 2000.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 98-00530  
Staff's 2<sup>nd</sup> Data Requests  
January 30, 2001  
Item No. 4  
Page 1 of 1

REQUEST: Did the regional settlement contain any rates, terms and/or conditions relating to the interconnection of the networks of BellSouth and Hyperion different from those contained in the Interconnection Agreement approved by the Authority and under which the parties are presently operating in Tennessee?

RESPONSE: Yes. However, such new rates, terms, and conditions will be contained in the new Interconnection Agreement between BellSouth and Hyperion which will be submitted to the Tennessee Regulatory Authority.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 98-00530  
Staff's 2<sup>nd</sup> Data Requests  
January 30, 2001  
Item No. 5  
Page 1 of 1

REQUEST: If the answer to (4) above is yes, will the regional settlement be filed with the Authority for approval as an amendment to the parties' Interconnection Agreement approved by the Authority and under which the parties are presently operating in Tennessee? If not, why not?

RESPONSE: Please see BellSouth's response to Staff's 2<sup>nd</sup> Data Requests, Item No. 4. The parties agree that the portion of their regional settlement agreement incorporating terms and conditions applicable on a going-forward basis will be filed with the Authority for approval. One part of the regional settlement agreement, however, refers to the settlement of past claims and is unrelated to the parties' interconnection agreement. That part of the regional settlement agreement is confidential and does not require Authority approval.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 98-00530  
Staff's 2<sup>nd</sup> Data Requests  
January 30, 2001  
Item No. 6  
Page 1 of 1

REQUEST: Did BellSouth commence making payments of reciprocal compensation to Hyperion within the 30 days set forth in the Authority's October 23, 2000 Order in this docket? If not, why not?

RESPONSE: No. As the Authority is aware, BellSouth appealed the Authority's October 23, 2000 Order and sought a stay of that Order in federal court. While BellSouth's motion for stay was pending (and it is still pending), the parties were able to reach a regional settlement on the reciprocal compensation issues, including the issues in this proceeding. BellSouth made payments to Hyperion on December 28, 2000 pursuant to the terms of the regional settlement agreement.

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2001, a copy of the foregoing document was served on the parties of record via facsimile, overnight, or US Mail, postage prepaid:

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight Mail

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Janet S. Livengood  
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A handwritten signature in black ink, consisting of a large, stylized 'S' or 'L' shape, followed by a horizontal line.